From: Bondy, Garret E

To: Saric, James

Cc: Abid, Joseph A; Bondy, Garret E; Chase Fortenberry; Garry Griffith; Jeff Keiser; Jessica Winter; Judith Alfano;

Julie Sims; Kathryn Huibregtse; Martin Lebo; Berkoff, Michael; Paul Bucholtz; Mendoza, Ramon; Richard Gay;

Sharon Hanshue; Todd.Goeks@noaa.gov

Subject: Kalamazoo River Superfund Site - Monthly Progress Report - May 2013

Date: Thursday, June 13, 2013 3:08:25 PM
Attachments: GP Signed 05 2013 Monthly SRIFS.pdf

Dear Mr. Saric,

On behalf of Mr. Chase Fortenberry and Georgia-Pacific LLC, this email transmits the May 2013 Monthly Progress Report (Report # 75). Hard copies of this report have also been sent via overnight courier to your and Mr. Bucholtz's attention.

Please contact Mr. Fortenberry with any questions you may have concerning this submittal.

Regards,

Garret E. Bondy, PE

AMEC Environment & Infrastructure

46850 Magellan Drive, Suite 190

Novi, Michigan 48377

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Georgia-Pacific LLC

133 Peachtree Street NE (30303-1847) Atlanta, Georgia 30303 (404) 652-6166 (404) 654-4701 fax www.gp.com

June 15, 2013

Mr. James Saric Remedial Project Manager USEPA Region 5 77 West Jackson Boulevard (SR-6J) Chicago, Illinois 60604-3511

Subject: Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site

Supplemental Remedial Investigations/Feasibility Studies Monthly Progress Report,

May 2013

Dear Jim:

Attached is the 75th monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site (Site) Supplemental Remedial Investigations/Feasibility Studies (SRI/FS). This progress report is submitted per Paragraph 37 of the February 2007 Administrative Settlement Agreement and Order on Consent (AOC), Docket No. V-W-07-C-864, and Section 7.1 of the associated Statement of Work (SOW). This report is also submitted per Paragraph 19a of the 2007 AOC for Removal Action (Docket No. V-W-07-C-863) and Paragraph 19a of the 2009 AOC for Removal Action (Docket No. V-W-09-C-925).

If you have any questions, please do not hesitate to contact me.

Sincerely,

L. Chase Fortenberry, PG

Manager – Environmental Engineering, Environmental Affairs

Georgia-Pacific LLC

Attachment

cc: Michael Berkoff, USEPA
Ramon Mendoza, USEPA
Paul Bucholtz, MDEQ
Judith Alfano, MDEQ
Sharon Hanshue, MDNR
Jeff Keiser, CH2M HILL
Todd Goeks, NOAA
Jessica Winter, NOAA
Julie Sims, NOAA
Richard Gay, Weyerhaeuser Company

Martin Lebo, Ph.D., Weyerhaeuser Company Kathy Huibregtse, ENVIRON Garry Griffith, P.E., Georgia-Pacific LLC Garret E. Bondy, P.E., AMEC E&I, Inc.

Monthly Progress Report for the Allied Paper, Inc./Portage Creek/ Kalamazoo River Superfund Site SRI/FS

REPORT #75, MAY 2013

Significant Developments and Activities during the Period:

- On May 9, 2013, Georgia-Pacific and AMEC met with USEPA and MDEQ (i.e. "Work Group") to agree upon methodologies related to surface-weighted average concentration (SWAC) calculation and fish trend analysis.
- On May 10, 2013, Georgia-Pacific and AMEC met with USEPA and MDEQ to agree on the response to the *Area 1 FS Report* comments. Meeting discussion also included Area 3 proposed residential incremental sampling approach.
- On May 17, 2013, Georgia-Pacific submitted a request to extend the Area 1 revised FS due date to July 29, 2013 and the Area 2 revised SRI due date to September 20, 2013. In doing so, the period for formal dispute resolution for both documents was ended.
- On May 23, 2013, Georgia-Pacific received formal notification from USEPA that the schedule extensions for the Area 1 revised FS and Area 2 revised SRI requested on May 17, 2013 had been granted.
- On May 23, 2013, Georgia-Pacific submitted AMEC's certificate of professional liability insurance to the USEPA.
- On May 31, 2013, Georgia-Pacific and USEPA discussed the addition of Toxic Substances Control Act (TSCA) criteria as an Applicable or Relevant and Appropriate Requirement (ARAR) to the Area 1 FS. The parties agreed that TSCA would be added as an ARAR with the understanding that the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) risk assessment process should meet the requirements of the TSCA program as it relates to polychlorinated biphenyl (PCB) contamination left in place.
- Area 1 SWAC calculation methodologies and fish trend analysis were agreed upon and completed by the project Work Group in May 2013.
- Georgia-Pacific awaits the following:
 - USEPA's approval of the final Former Plainwell Impoundment and Plainwell No. 2
 Dam Area Bank Conditions Monitoring Report, submitted December 31, 2012.
 - MDEQ's response to the January 9, 2013 Freedom of Information Act request.
 - USEPA and MDEQ notice of approval or disapproval and comments on the revised Area 4 SRI/FS Work Plan, submitted April 26, 2013.

Data Collected and Field Activities Conducted during the Period

None.

Laboratory Data Received during the Period

None.

Problems

None.

Actions Taken to Correct Problems

None.

Monthly Progress Report for the Allied Paper, Inc./Portage Creek/ Kalamazoo River Superfund Site SRI/FS

REPORT #75, MAY 2013

Developments Anticipated during the Next Two Reporting Periods

- In June 2013, Georgia-Pacific is scheduled to submit the revised Area 3 Work Plan and Field Sampling Plan. Work included in these plans is anticipated to occur in July 2013, pending receipt of approval from USEPA.
- In June 2013, Georgia-Pacific anticipates receipt of USEPA notice of approval or disapproval and comments on the revised *Area 4 SRI/FS Work Plan*, submitted April 26, 2013.
- The Plainwell Final Inspection has been rescheduled for June 11, 2013.
- The annual bank inspection for the Plainwell No. 2 Dam Area has been scheduled for June 12, 2013.